

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Criminal Case No. 24-274

vs.

J. Ranjan

DONALD SMITH

**SUPPLEMENTAL REPLY TO RESPONSE IN OPPOSITION**  
**BY THE GOVERNMENT**

That, Donald Smith, Defendant, through his counsel, respectfully files the within Supplemental Reply to Response in Opposition by the Government and in support thereof avers:

1. That defendant as previously stated had been awarded 392 contracts by the DLA (Doc. 28 at 1). These awards date from 1/03/2023 to 12/17/2024 (Please see Exhibit 1 attached hereto and incorporated herein) and those which are included in Counts 4 – 8 (Doc. 3 at 6) so as to show this Honorable Court the full spectrum of awards.

2. That the Government has not alleged nonconforming as to @ 387 contracts though the exact same products in some instances were provided with no issue from the Defense Logistics Agency (DLA).

3. That the @ 387 contracts awarded with no issue support defendants original request to Amend Conditions of Release.

Respectfully submitted,  
/s/ Michael J. Machen

Michael J. Machen  
Defense Counsel for Donald Smith